

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

**WILLIAM ALLEN MEANS,**

**Plaintiff,**

**v.**

**Civil Action No.: 2:20-cv-00561**

**E.M. PETERSON, D. HARVEY, and  
THE CITY OF SOUTH CHARLESTON,**

**Defendants.**

**NOTICE OF VIDEOTAPED DEPOSITION OF DEFENDANT E.M. PETERSON**

Please take notice that Plaintiff, William Allen Means, by counsel, L. Danté diTrapano, Alex McLaughlin, Benjamin D. Adams, and the law firm of Calwell Luce diTrapano, PLLC, and William C. Forbes, W. Jesse Forbes, and the law firm of Forbes Law Offices, PLLC, will take the deposition of Defendant E.M. Peterson on Tuesday, March 30, 2020 at 1:00 p.m. EST at the law firm of Pullin, Fowler, Flanagan, Brown & Poe, PLLC, 901 Quarrier Street, Charleston, WV 25301 before a certified court reporter, or other person authorized to administer oaths and shall be recorded by stenographic means. This deposition will continue from day to day until completed. You are invited to protect your interests, if any.

**WILLIAM ALLEN MEANS,**  
By counsel

/s/Benjamin D. Adams  
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**CERTIFICATE OF SERVICE**

The undersigned, counsel of record for Plaintiff, William Allen Means, does hereby certify that on this 1st day of March, 2021, a copy of this “Notice of Videotaped Deposition of Defendant E.M. Peterson” was served upon all parties via the CM/ECF system:

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